

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Case No. 2:25-cr-00015-1
	)	
TERESA YOUNGBLUT,	)	
Defendant.	)	

**GOVERNMENT’S PROPOSED PROTOCOL FOR  
COURT OR SPECIAL MASTER REVIEW OF  
DEFENDANT’S PRETRIAL DETENTION RECORDS**

NOW COMES the United States of America, by and through its attorney, Michael P. Drescher, Acting United States Attorney for the District of Vermont, and David L. Jaffe, Chief of the Department of Justice Violent Crime and Racketeering Section, and moves this Honorable Court to order the effectuation of the government’s proposed protocol for assessing any privilege applicable to the detention records of defendant Teresa Youngblut.

As stated by defense counsel in “Defendant’s Proposed Protocol for Court or Special Master Review of Defendant’s Pretrial Detention Records” filed with the Court on July 11, 2025, (ECF No. 85), although the parties were able to narrow some areas of dispute, the parties were not able to reach agreement and are each submitting their respective protocols for the Court’s consideration.

The United States moves the Court to set a hearing on this matter. Given that defense has indicated its intention to submit to the Court, within fourteen (14) days (or on any timeline set by the Court), its objections to the government’s proposed protocol, we ask the Court to set a hearing to occur between July 28 and August 1, 2025.

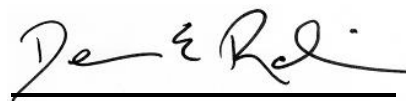
Dated at Burlington, in the District of Vermont, July 11, 2025.

Respectfully submitted,

UNITED STATES OF AMERICA

MICHAEL P. DRESCHER  
Acting United States Attorney

By:

A handwritten signature in black ink, appearing to read "Dennis E. Robinson", written over a horizontal line.

Dennis E. Robinson  
Maryland Bar No. 1406170247  
Trial Attorney  
Violent Crime & Racketeering Section  
United States Department of Justice